

EXHIBIT B



Vanessa Stine <vstine@aclupa.org>

[immediate attention required]: A.S.R. v. Trump (3:25-cv-113)

1 message

Vanessa Stine <vstine@aclupa.org>

Fri, Apr 18, 2025 at 12:06 PM

To: "Ivory, Michael (USAPAW)" <Michael.Ivory@usdoj.gov>, Laura.Irwin@usdoj.gov

Cc: Vic Walczak <vwalczak@aclupa.org>, Keith Armstrong <Karmstrong@aclupa.org>

Hi Mike and Laura:

We have heard that everyone at Bluebonnet is about to be removed from the United States. **We are writing for immediate confirmation that A.S.R. will not be removed from the United States.**

Additionally, we have identified an additional person that based on that information given to us, appears to be a putative class member under the A.S.R. He is also at Bluebonnet. **We ask that you also immediately confirm that he will not be removed from the United States. His name is F [REDACTED] R [REDACTED] C [REDACTED] -C [REDACTED], A [REDACTED].**

Vanessa

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On Fri, Apr 18, 2025 at 10:35 AM Vanessa Stine <vstine@aclupa.org> wrote:

Hi Mike and Laura:

We are writing about A.S.R. and the TRO protections afforded to him and all other putative class members. We have heard multiple reports of possible Alien Enemies Act designation of people detained at Bluebonnet Detention Center and imminent removal. As you know, A.S.R. is currently detained at Bluebonnet. We previously provided A.S.R.'s full name and A# to the government but here it is again: A [REDACTED] S [REDACTED] -R [REDACTED]. His DOB is [REDACTED] and his A# is [REDACTED].

We are writing to ask for assurances from your U.S. attorney's office that you have communicated with your clients, the Respondents (including ICE), about A.S.R. and any putative class members who were transferred with A.S.R. to Bluebonnet (or elsewhere) about the current TRO in place that prohibits their removal from the United States (we know you have copies of the orders but I've attached them again here). Please confirm that you have communicated to the Respondents that A.S.R. and all putative class members may not be removed from the United States and confirm that Respondents have affirmatively stated that they will not remove A.S.R. and all putative class members covered by Judge Haines' TRO from the United States. Thank you.

Vanessa

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